UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: FELICIA HERNANDEZ : CHAPTER 13

Debtor(s)

:

CHARLES J. DEHART, III

STANDING CHAPTER 13 TRUSTEE

Movant

:

VS.

:

FELICIA HERNANDEZ

Respondent(s) : CASE NO. 5-18-bk-00676

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 21st day of May, 2018, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

- 1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
 - a. Plan ambiguous:
 - (1) Payment
 - (2) Sale of Winding Way

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 24th day of May, 2018, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Patrick James Best, Esquire 18 N. 8th Street Stroudsburg, PA 18360

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee